FRIED, FRANK, HARRIS, SHRIVER & JACOBSON LLP



Direct Line: +1.212.859.8182

Email: janice.macavoy@friedfrank.com

February 19, 2025

## **VIA ECF**

Honorable John G. Koeltl, U.S.D.J. United States District Court, S.D.N.Y. 500 Pearl Street, Courtroom 1A New York, NY 10007

Re:

SOL-MM III LLC v. JPMorgan Chase Bank, N.A., et al., Case No. 1:23-cv-06479

(JGK)

Dear Judge Koeltl:

We write on behalf of Defendants JPMorgan Chase Bank, N.A. ("JPMorgan"), D5 Hawks LLC, WE Tahoe 1 LLC and WE Tahoe 2 LLC (collectively, the "JPM Defendants") in the above-referenced matter.

We write to request an adjournment of the oral argument on Defendants' Motions to Dismiss currently scheduled for Wednesday, March 12, 2025 at 2:30 p.m. (see Order, ECF 117) to Wednesday, March 19, 2025. Counsel for JPM Defendants has pre-existing international travel planned for March 12th. We have conferred with counsel for Plaintiff and our co-Defendants and no party objects to our request for adjournment. Further, all counsel compared schedules and we can confirm that all parties are available on March 19th. If the Court is not available that day, the parties are available on the following dates in March and April 2025:

- March 19 and 31
- April 4, 7-11, 14, 16-18, and 28-30

The requested adjournment does not affect any other scheduled dates.

MARCH 19 2024, AT 2:00PM

Sincerely,

CO ORDERED

/s/ Janice Mac Avoy

Janice Mac Avoy

2/20/25 Pro/belt -

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KRAMER LEVIN NAFTALIS & FRANKEL LLP

/s/ William J. Trunk

William J. Trunk Co-Counsel for the JPM Defendants